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Attorneys for Elissa D. Miller, Chapter 7  
Trustee

**UNITED STATES BANKRUPTCY COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**  
**LOS ANGELES DIVISION**

In re

GIRARDI KEESE,

Debtor.

Case No. 2:20-bk-21022-BR

Chapter 7

**NOTICE OF MOTION FOR ORDER  
AUTHORIZING THE PRODUCTION OF  
DOCUMENTS BY THE CUSTODIAN OF  
RECORDS OF CITIZENS BUSINESS  
BANK PURSUANT TO FEDERAL RULE  
OF BANKRUPTCY PROCEDURE 2004**

**Proposed Production Deadline:**

**DATE: November 8, 2021**

**TIME: 5:00 p.m. PST**

**PLACE: Smiley Wang-Ekvall, LLP  
3200 Park Center Dr., Suite 250  
Costa Mesa, CA 92626**

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1 **TO ALL PARTIES ENTITLED TO NOTICE:**

2 Elissa D. Miller, the chapter 7 trustee (the "Trustee") for the bankruptcy estate of  
3 Girardi Keese (the "Debtor"), has filed a *Motion for Order Authorizing the Production of*  
4 *Documents by the Custodian of Records of Citizens Business Bank Pursuant to Federal*  
5 *Rule of Bankruptcy Procedure 2004* (the "Motion"). The Trustee requests that the Motion  
6 be granted without a hearing pursuant to Local Bankruptcy Rule 9013-1(p). A full copy of  
7 the Motion is filed and served concurrently with this notice.

8 The Trustee will promptly lodge an order that the Court may use to rule on the  
9 Motion, as the Court may rule on the Motion without a hearing and without an opportunity  
10 for any party to file a request for hearing.

11 Local Bankruptcy Rule 2004-1(f) provides in part:

12 The party whose examination is requested may file a motion for protective  
13 order if grounds exist under FRBP 7026 and F.R.Civ.P. 26(c). A motion for  
14 protective order must be filed and served not less than 14 days before the  
15 date of the examination, and set for hearing not less than 2 days before the  
16 scheduled examination, unless an order setting hearing on shortened notice  
17 is granted by the court pursuant to LBR 9075-1.

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DATED: September 23, 2021

SMILEY WANG-EKVALL, LLP

By: /s/ Timothy W. Evanston

TIMOTHY W. EVANSTON

Attorneys for Elissa D. Miller, Chapter 7  
Trustee

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## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is 3200 Park Center Drive, Suite 250, Costa Mesa, CA 92626.

A true and correct copy of the foregoing document entitled (*specify*): **NOTICE OF MOTION FOR ORDER AUTHORIZING THE PRODUCTION OF DOCUMENTS BY THE CUSTODIAN OF RECORDS OF CITIZENS BUSINESS BANK PURSUANT TO FEDERAL RULE OF BANKRUPTCY PROCEDURE 2004** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) September 23, 2021 I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page.

**2. SERVED BY UNITED STATES MAIL:**

On (*date*) September 23, 2021, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

The Honorable Barry Russell  
U.S. Bankruptcy Court  
Roybal Federal Building  
255 E. Temple Street, Suite 1660  
Los Angeles, CA 900125

Citizens Business Bank  
Attention: VP, Associate General Counsel  
**Yale K. Kim** | VP, Associate General Counsel  
Corporate Legal Department  
701 North Haven Avenue, Suite 350, Ontario, CA 91764

☐ Service information continued on attached page.

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) 9/23/2021, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

VIA E-Mail:  
Citizens Business Bank  
Yale K. Kim | VP, Associate General Counsel  
ykkim@cbbank.com

☐ Service information continued on attached page.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

September 23, 2021

Gabriela Gomez-Cruz

/s/ Gabriela Gomez-Cruz

Date

Printed Name

Signature

**TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):**

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This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.